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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL DIVERSITY, et al.,

Plaintiffs,

V.

DEBRA HAALAND, et al.,

Defendants,

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

Case No. 2:24-cv-05459-MWC-MAA

**DECLARATION OF KRISTEN
MONSELL IN SUPPORT OF
PLAINTIFFS' OPPOSITION
TO FEDERAL DEFENDANTS'
MOTION FOR VOLUNTARY
REMAND**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 6A

Honorable Michelle Williams Court
United States District Judge

1 I, Kristen Monsell, hereby declare as follows:
2

3 1. I am counsel for Plaintiffs Center for Biological Diversity and
4 Wishtoyo Foundation in this case. I submit this declaration in support of Plaintiffs'
5 Opposition to Federal Defendants' Motion for Voluntary Remand. If called as a
6 witness, I could and would competently testify to the matters set forth herein.
7

8 2. Attached as Exhibit 1 is a true and correct copy of a Form 8-K Report
9 prepared by Sable Offshore Corp. (Sable) dated December 19, 2024. I obtained a
10 copy on the Securities and Exchange Commission's website here:
11

<https://www.sec.gov/Archives/edgar/data/1831481/000119312524281658/d859221d8k.htm>.

12 3. Attached as Exhibit 2 is a true and correct copy of excerpts of Sable's
13 Integrated Contingency Plan for the Las Flores Pipeline dated February 2024. I
14 obtained a copy in response to a Public Records Act Request to the California
15 Department of Fish and Wildlife.

16 4. Attached as Exhibit 3 is a true and correct copy of excerpts of Sable's
17 Pacific Region Oil Spill Response Plan. I obtained a copy in response to a Public
18 Records Acts Request to the California Department of Fish and Wildlife.

19 5. Attached as Exhibit 4 is a true and correct copy of excerpts of the
20 permits that Federal Defendants the Bureau of Safety and Environmental
21 Enforcement, et al. (collectively, BSEE) issued to Sable Offshore Corp. on
22 September 25, 2024. I obtained the copies on BSEE's website here:
23

<https://www.bsee.gov/stats-facts/ocs-regions/pacific/pacific-region-completed-applications-for-permit-to-modify-apm>.

1 6. Attached as Exhibit 5 is a true and correct copy of air quality data
2 from the California Air Resources Board, with the rows showing air pollution
3 emitted by the processing of oil and gas produced at the Santa Ynez Unit
4 highlighted by Plaintiffs. I obtained a copy on the agency's website here:
5 [https://www.arb.ca.gov/carbapps/pollution-
6 map/? _ga=2.202413649.1597022833.1736485182-983933942.1727925971](https://www.arb.ca.gov/carbapps/pollution-map/?_ga=2.202413649.1597022833.1736485182-983933942.1727925971).

7 7. Attached as Exhibit 6 is a true and correct copy of a Santa Barbara
8 County's Air Pollution Control District Final Reporting Form for Breakdowns
9 dated January 1, 2015. I obtained a copy in response to a Public Records Act
10 Request to the County.

11 8. Attached as Exhibit 7 is a true and correct copy of excerpts of a Sable
12 Prospectus dated November 1, 2024. I obtained a copy here:
13 [https://d18rn0p25nwr6d.cloudfront.net/CIK-0001831481/e480388f-48dd-4ecf-
bf8e-dcd17758932b.pdf](https://d18rn0p25nwr6d.cloudfront.net/CIK-0001831481/e480388f-48dd-4ecf-
14 bf8e-dcd17758932b.pdf).

15 9. Attached as Exhibit 8 is a true and correct copy of the categorical
16 exclusion reviews that BSEE completed on its issuance of two production permits
17 to Sable Offshore Corp. on September 25, 2024. I obtained these copies from
18 BSEE via a request under the Freedom of Information Act.

19 10. Attached as Exhibit 9 is a true and correct copy of excerpts of a story
20 from NPR dated November 15, 2024, titled "Trump wants to 'Drill, baby, drill.'
21 What does that mean for climate concerns?" I obtain a copy here:

22 [https://www.npr.org/2024/11/13/nx-s1-5181963/trump-promises-more-drilling-in-
the-u-s-to-boost-fossil-fuel-production](https://www.npr.org/2024/11/13/nx-s1-5181963/trump-promises-more-drilling-in-the-u-s-to-boost-fossil-fuel-production).

1
2 I declare under penalty of perjury that the foregoing declaration is true and
3 correct to the best of my knowledge.
4

5 Executed this 10th day of January 2025,
6

7 /s/ Kristen Monsell

8 Kristen Monsell

9 *Attorney for Plaintiffs*

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EXHIBIT 1

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

FORM 8-K

**CURRENT REPORT
PURSUANT TO SECTION 13 OR 15(D)
OF THE SECURITIES EXCHANGE ACT OF 1934**

Date of Report (Date of earliest event reported): December 17, 2024

Sable Offshore Corp.

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction
of incorporation)

001-40111
(Commission
File Number)

85-3514078
(I.R.S. Employer
Identification No.)

**845 Texas Avenue, Suite 2920
Houston, Texas**
(Address of Principal Executive Offices)

77002
(Zip Code)

(713) 579-6161
(Registrant's telephone number, including area code)

Check the appropriate box below if the Form 8-K is intended to simultaneously satisfy the filing obligation of the registrant under any of the following provisions:

- Written communication pursuant to Rule 425 under the Securities Act (17 CFR 230.425)
- Soliciting material pursuant to Rule 14a-12 under the Exchange Act (17 CFR 240.14a-12)
- Pre-commencement communications pursuant to Rule 14d-2(b) under the Exchange Act (17 CFR 240.14d-2(b))
- Pre-commencements communications pursuant to Rule 13e-4(c) under the Exchange Act (17 CFR 240.13e-4(c))

Securities registered pursuant to Section 12(b) of the Act:

Title of each class	Trading Symbol(s)	Name of each exchange on which registered
Common Stock, par value \$0.0001 per share	SOC	The New York Stock Exchange

Indicate by check mark whether the registrant is an emerging growth company as defined in Rule 405 of the Securities Act of 1933 (§230.405 of this chapter) or Rule 12b-2 of the Securities Exchange Act of 1934 (§240.12b-2 of this chapter).

Emerging growth company

If an emerging growth company, indicate by check mark if the registrant has elected not to use the extended transition period for complying with any new or revised financial accounting standards provided pursuant to Section 13(a) of the Exchange Act.

Item 8.01 Other Events.

On December 17, 2024, the California Office of the State Fire Marshal (“OSFM”) approved Sable Offshore Corp.’s (“Sable”) implementation of enhanced pipeline integrity standards for the intrastate pipeline segments, Lines CA-324 and CA-325A/B (the “Pipeline”). In recognition of these robust measures, OSFM granted state waivers of certain regulatory requirements related to cathodic protection and seam weld corrosion for the Pipeline. The state waivers represent a significant milestone achievement in satisfying the requirements of the federal court ordered consent decree, which includes the granting of these waivers by the OSFM as a condition for restarting the Pipeline. Sable expects to begin hydrotesting the Pipeline in January 2025 in advance of a potential restart of production from the Santa Ynez Unit offshore platforms and the associated Las Flores Canyon processing facilities in the first quarter of 2025.

Cautionary Statement Regarding Forward-Looking Statements

The information in this Current Report on Form 8-K includes “forward-looking statements” within the meaning of the Private Securities Litigation Reform Act of 1995. When used in this press release, the words “could,” “should,” “will,” “may,” “believe,” “anticipate,” “intend,” “estimate,” “expect,” “project,” “continue,” “plan,” “forecast,” “predict,” “potential,” “future,” “outlook,” and “target,” the negative of such terms and other similar expressions are intended to identify forward-looking statements, although not all forward-looking statements will contain such identifying words. These statements are based on the current beliefs and expectations of Sable’s management and are subject to significant risks and uncertainties. Actual results may differ materially from those described in the forward-looking statements. Factors that could cause Sable’s actual results to differ materially from those described in the forward-looking statements include: the ability to recommence production of the SYU assets and the cost and time required therefor; litigation, complaints and/or adverse publicity; our ability to comply with laws and regulations applicable to our business; and other one-time events and other factors that can be found in Sable’s Annual Report on Form 10-K for the year ended December 31, 2023, and any subsequent Quarterly Report on Form 10-Q or Current Report on Form 8-K, which are filed with the Securities and Exchange Commission and are available on Sable’s website (www.sableoffshore.com) and on the Securities and Exchange Commission’s website (www.sec.gov). Except as required by applicable law, Sable undertakes no obligation to publicly release the result of any revisions to these forward-looking statements to reflect the impact of events or circumstances that may arise after the date of this Current Report on Form 8-K.

Item 9.01 Financial Statements and Exhibits(d) *Exhibits*

<u>Exhibit No.</u>	<u>Description of Exhibits</u>
104	Cover page Interactive data file (embedded within the inline XBRL document).

SIGNATURE

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

Sable Offshore Corp.

Date: December 19, 2024

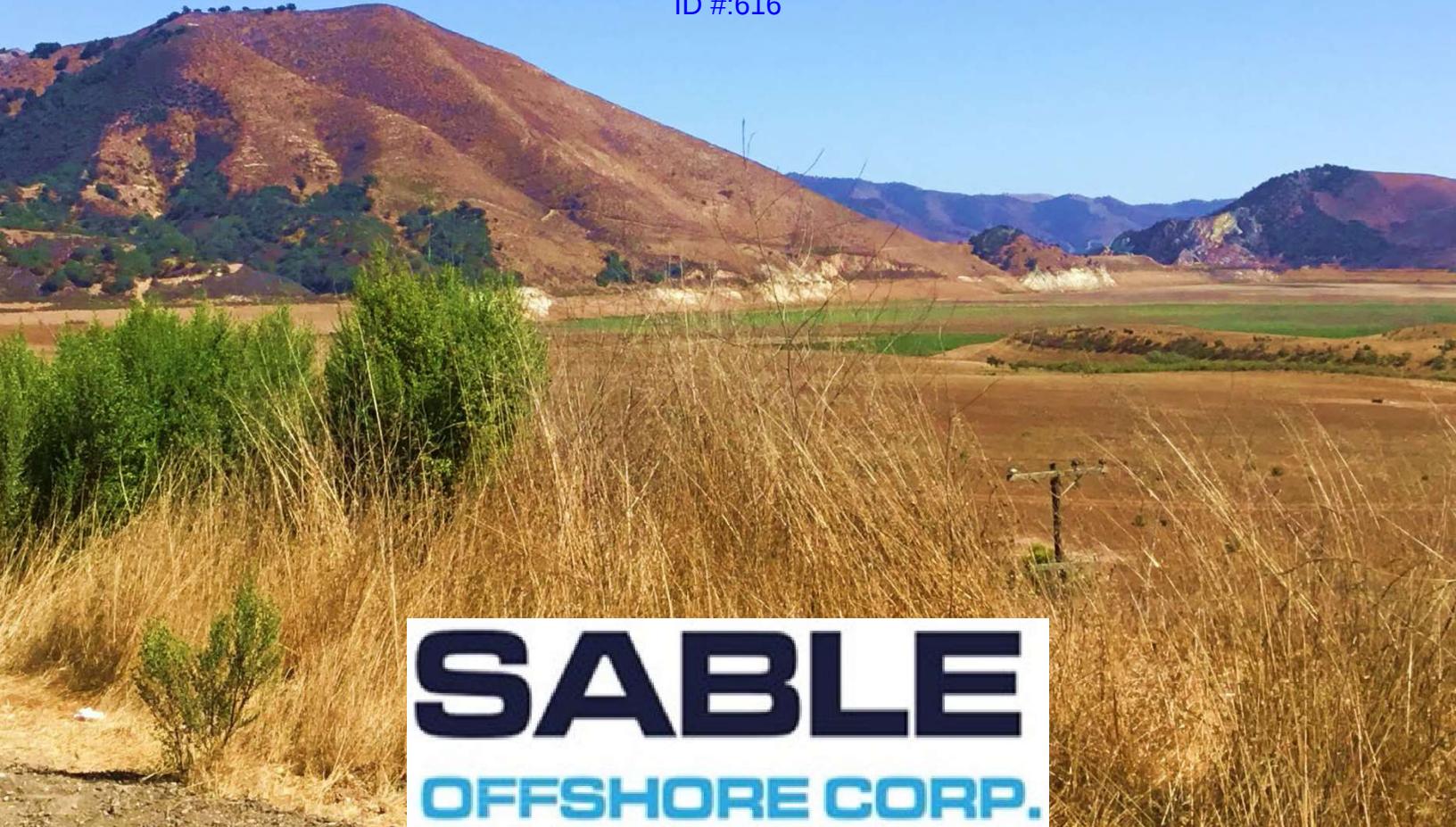
By: /s/ Gregory D. Patrinely

Name: Gregory D. Patrinely

Title: Executive Vice President and Chief Financial Officer

3

EXHIBIT 2



**Pacific Pipeline Company
Integrated Contingency Plan
Las Flores Canyon Core Plan**

**12000 Calle Real
Goleta, California 93117**

**CAL OSPR # TBD
PHMSA Sequence # TBD**

Developed by:



Houston TX, New Orleans LA, Anchorage AK
www.responsegroupinc.com
281.880.5000



Section 1	Introduction	5
1.1	Purpose and Scope.....	5
1.2	ICP Objectives	5
1.3	Plan Contents	6
1.4	Plan Implementation and Management	8
1.5	Corporate Policy Statement	12
Section 2	Pre-Emergency Planning.....	1
2.1	Pre-Emergency Planning and Prevention Mechanisms.....	1
2.2	Discharge Prevention	2
2.3	Discharge Detection.....	10
2.4	Public Awareness Program	15
Section 3	Emergency Response Actions	1
3.1	Initial Response Procedures.....	1
3.2	Immediate Response Actions Checklist.....	3
3.3	Oil Spill Response Actions	5
3.4	Fire/Explosion	8
3.5	Natural or Other Gas Release Response Actions.....	9
3.6	Injury/Medical Emergency Response Actions.....	10
3.7	Severe Weather/Natural Disaster Response Actions.....	11
3.8	Security Incident Response Actions	14
3.9	Notification Procedures	15
Section 4	Incident Management.....	1
4.1	Pacific Tier Structure	1
4.2	Qualified Individual.....	2
4.3	Coordinating with Government Agencies.....	5
4.4	Incident Command System	6
4.5	Roles and Responsibilities	11
4.6	Incident Communication.....	14
4.7	Incident Documentation.....	15
4.8	Response Termination & Follow-up Procedures	15



**Las Flore Pipeline
Integrated Contingency Plan**

Table of Contents

Section 5	Containment, Recovery, and Disposal.....	1
5.1	Containment and Recovery.....	1
5.2	Spill Assessment and Tracking.....	2
5.3	Terrestrial Spills.....	8
5.4	Aquatic Spills	15
5.5	Alternative Response Technologies.....	16
5.6	Waste Generation and Disposal	19
5.7	Natural Resource Damage Assessment.....	24
Section 6	Site Safety and Control.....	1
6.1	Health and Safety.....	1
6.2	Site Security and Control.....	10
Section 7	Training, Drills, and Exercises	1
7.1	Response Training	1
7.2	Response Exercise Program.....	3
7.3	Recordkeeping	5
Section 8	Reserved.....	1
Section 9	Reserved.....	1
Section 10	Reserved.....	1



**Las Flore Pipeline
Integrated Contingency Plan**

Section 1:
Introduction

Core Plan Revision Log

Core Plan Revision Log						
Assigned location of this manual is:	Headquarters – Sable Offshore Corp. 12000 Calle Real Goleta, California 93117					
The individual designated to review this manual is :						
Title of Identified Reviewer:						
Name of Identified Reviewer:						
This manual was revised as indicated below:						
Name	Date	Revision Type	Sections Revised			
Sable Offshore Corp.	Feb. 2024	New Plan	All. New plan implementation.			

List of Acronyms

Term	Definition
ACP	Area Contingency Plan
AMP	Average Most Probably Discharge
AOR	Area of Responsibility
ART	Alternative Response Technologies
CCR	California Code of Regulations
CERCLA	Comprehensive Environmental Response Compensation & Liability Act
CFR	Code of Federal Regulations
COML	Communications Unit Leader
COTP	Captain of the Port
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DOCL	Documentation Unit Leader
DOT	Department of Transportation
ENVL	Environmental Unit Leader
EPA	Environmental Protection Agency



**Las Flore Pipeline
Integrated Contingency Plan**

Section 1:
Introduction

Term	Definition
SIMA	Spill Impact Mitigation Assessment
SITL	Situation Unit Leader
SMT	See IMT
SOFR	Safety Officer
SOSC	State On-Scene Coordinator
SSP	Site Safety Plan
SYU	Santa Ynez Unit
TFR	Temporary Flight Restriction
TLC	Trunk Line Chart
TPIC	Terminal Person in Charge
TRP	TRP Tactical Response Plan
TTX	Tabletop Exercise
UAV	Unmanned Aerial Vehicle
UC	Unified Command
USCG	United States Coast Guard
WCD	Worst Case Discharge



Las Flores Pipeline Integrated Contingency Plan

Section 14:
Response Planning &
Strategies

14.2.3 Pipeline System Calculations

For purposes of estimating the time to detect a release it is assumed the mode of failure is a catastrophic failure or impingement of the pipeline because these are the only conditions where maximum flow rate would apply.

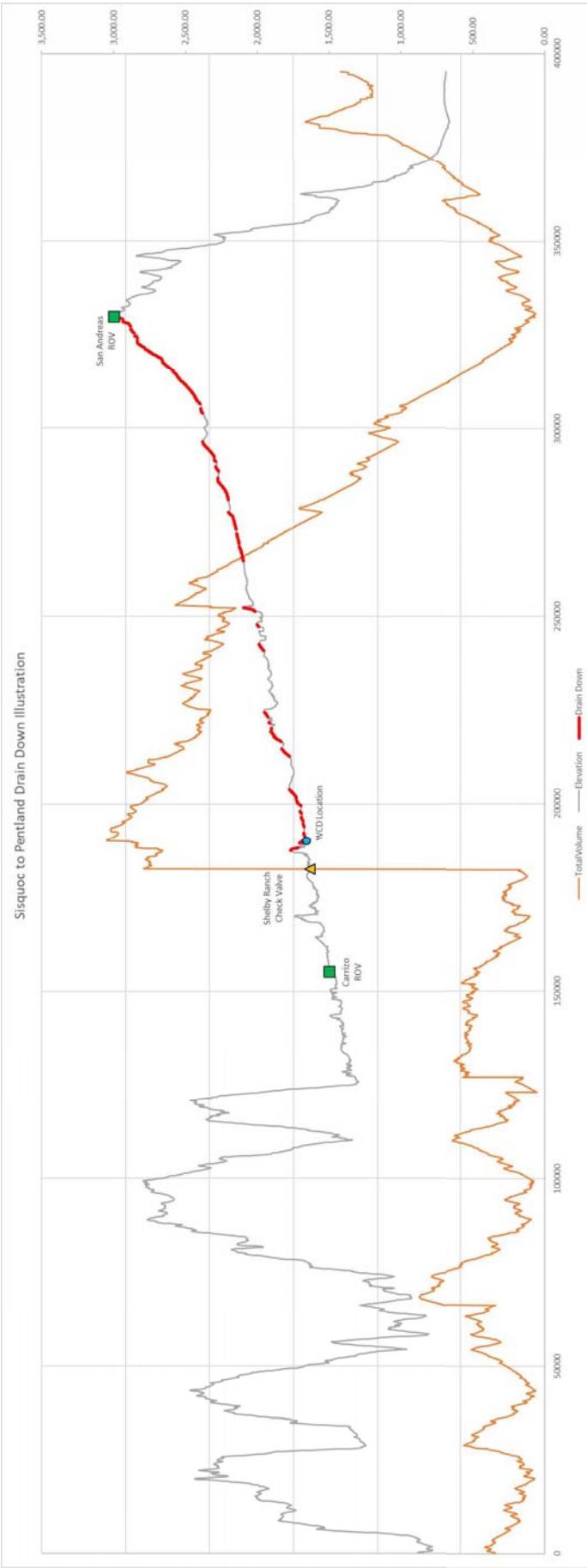
The WCD/RWCS line section on the CA-325B is between the Check Valve at Shelby Ranch (4791+61) and a MOV located at the San Andreas fault (5900+64).

Pipeline System Calculations

$$\text{WCD/RWCS} = [(\text{RDT} + \text{SRT}) \times (\text{MFR})] + [\text{LDV}]$$

Where:

RDT	=	The pipeline system release detection time in hours = .48 hours.
SRT	=	The shutdown response time in hours = .10 hours.
MFR	=	The maximum flow rate in barrels per hour (BPH), based on the maximum daily capacity of the pipeline = 0 barrels per hour (BPH).
LDV	=	The line drainage down volume calculation, in barrels, considers all of the pipe volume that can drain, by gravity alone, through the rupture. The calculation considers pipe in the upstream direction until the nearest remote operated valve (ROV) (since check valves only prevent backflow) and in the downstream direction until the nearest check valve or ROV. The calculation considers pipe that is higher elevation than the release point but not lower elevation than a closer relative maximum. So, in simple terms, the downstream side of hills are included on the upstream side of the release point and the upstream side of hills are included on the downstream side of the release point. The LDV for the WCD/RWCS location is 0 bbl..
WCD	=	Total WCD is 0 bbl.



The above graph illustrates the LDV for the WCD/RWCS location, which is located on the Sisquoc to Pentland line segment. The nearest upstream ROV is at Carrizo, and the nearest downstream valve (check or ROV) is at San Andreas. The gray line below is the elevation profile, and the orange line is the spill volume. The red portions of the gray line are the segments that contribute to the LDV of 41,899 bbl. As you can see on the graph, there is a significant amount of pipe between the upstream and downstream valves that is not red, because that pipe would not be able to drain down by gravity alone. Because the terrain on this pipeline has a significant impact on the LDV calculation, the calculation may not be able to be exactly replicated without the same software, input parameters, elevation profile and modeling resolution.

EXHIBIT 3



SABLE OFFSHORE CORP.

Pacific Region Oil Spill Response Plan

12000 Calle Real
Goleta, California 93117

BSEE # 03726
OSPR # CA-00-7239

Developed by:



Houston TX, New Orleans LA, Anchorage AK
www.responsegroupinc.com
281.880.5000



**Pacific Region
Oil Spill Response Plan**

Section 1:
Quick Guide

Sable Offshore OCS Production Facilities

Area	Block	Lease	Facility Name	Facility ID ¹	Water Depth	Latitude/Longitude	Distance to Shore	API Gravity	Rating ²	High Well ³	All Storage ⁴	Thru Volume ⁵
SM	6636	P-0188	Hondo	51005	850	34° 23' 26.6"N 120° 07' 13.9"W	5.0	19.8	B	--	--	0
SM	6635	P-0190	Harmony	51017	1200	34° 22' 36"N 120° 10' 03"W	6.3	21.9	B	--	--	0
SM	6683	P-0182	Heritage	51018	1075	34° 21' 01"N 120° 16' 45"W	8.0	15.7	B	--	--	0

¹ BSEE complex identification number of facility.

² Worst-case discharge volume rating based on the following table:

Rating	Volume (bbl.)
A	0 – 1,000
B	1,001 – 3,000
C	3,001 – 10,000
D	10,001 – 20,000
E	20,000+

³ If Rating is E or if high rate well has a daily flow rate > 2,500 bbl., provide the rate that oil is being produced in bpd from an uncontrolled flow

⁴ If Rating is E or if high rate well has a daily flow rate > 2,500 bbl., provide the total volume in bbl. of all tanks on the facility used for the storage of oil including production (e.g., fuel oil including diesel fuel, corrosion inhibitors)

⁵ If Rating is E or if high rate well has a daily flow rate > 2,500 bbl., provide the throughput volume in bpd of the lease term pipelines that depart the facility.

EXHIBIT 4

Application for Permit to Modify (APM)

Lease P00182	Area SM	Block 6683	Well Name HE023	ST 00	BP 00	Type Development
Application Status Approved			Operator 03726 Sable Offshore Corp			

Pay.gov	Agency	Pay.gov
Amount: \$145.00	Tracking ID: EWL-APM-253736	Tracking ID: 27HQJCVF

General Information

API 043112075100	Approval Dt 25-SEP-2024	Approved By Carl Lakner
Submitted Dt 19-SEP-2024	Well Status Completed	Water Depth 1075
Surface Lease P00182	Area SM	Block 6683

Approval Comments

Conditions of Approval:

- 1) All operations must be conducted in accordance with the OCS Lands Act (OCSLA), the lease terms and stipulations, the regulations of 30 CFR Part 250, Notices to Lessees and Operators (NTLs), the approved (revised) Application for Permit to Modify (APM/RPM), and any written instructions or orders of the District Manager.
- 2) A copy of this permit (including all attachments) must be kept on location and made available to inspectors upon request during the permitted operation.
- 3) All pressure containing equipment must be tested to the approved permitted pressure and recorded on the daily operations report. If well pressures exceed the SITP/MASP stated in the approved permit, the equipment in use must be tested at a minimum to the new observed pressure. The appropriate District must be immediately notified of this pressure change and a RPM submitted to document the change.
- 4) WARS Due BY Wednesdays

Correction Narrative

Permit Primary Type Enhance Production

Permit Subtype(s)

Other Enhance Production

Proposed or **Completed Work**

Operation Description

Use electricline to add 181' MD of perforations, 51' MD in the MC 10 and 130' MD in the MC 20.

Procedural Narrative

See attachment.

Subsurface Safety Valve

Type Installed SCSSV

Feet below Mudline 639

Maximum Anticipated Surface Pressure (psi) 2336

Shut-In Tubing Pressure (psi)

Maximum Anticipated Wellhead Pressure (psi)

Shut-In Wellhead Pressure (psi) 1420

Rig Information

Name	Id	Type	ABS Date	Coast Guard Date
Blowout Preventers				
Preventer	Size	Working Pressure	Low	High
Wireline Luber		10000		5000

Application for Permit to Modify (APM)**Lease** P00182 **Area** SM **Block** 6683 **Well Name** HE023 **ST** 00 **BP** 00 **Type** Development**Application Status** Approved **Operator** 03726 Sable Offshore Corp**Reviews**

Review:	APM - District Production Engineering Review
----------------	--

Sent:	20-SEP-24
--------------	-----------

Review Started:	25-SEP-24
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Review Finished:	25-SEP-24
-------------------------	-----------

Info Adequate:	Y
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Review Remarks:	
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Review:	Determination of NEPA Adequacy
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Sent:	20-SEP-24
--------------	-----------

Review Started:	20-SEP-24
------------------------	-----------

Review Finished:	20-SEP-24
-------------------------	-----------

Info Adequate:	Y
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Review Remarks:	
------------------------	--

Application for Permit to Modify (APM)

Lease P00182	Area SM	Block 6683	Well Name HE028	ST 00	BP 00	Type Development
Application Status Approved			Operator 03726 Sable Offshore Corp			

Pay.gov	Agency	Pay.gov
Amount: \$145.00	Tracking ID: EWL-APM-253740	Tracking ID: 27HR3FNL

General Information

API 043112076200	Approval Dt 25-SEP-2024	Approved By Carl Lakner
Submitted Dt 19-SEP-2024	Well Status Completed	Water Depth 1075
Surface Lease P00182	Area SM	Block 6683

Approval Comments

Conditions of Approval:

- 1) All operations must be conducted in accordance with the OCS Lands Act (OCSLA), the lease terms and stipulations, the regulations of 30 CFR Part 250, Notices to Lessees and Operators (NTLs), the approved (revised) Application for Permit to Modify (APM/RPM), and any written instructions or orders of the District Manager.
- 2) A copy of this permit (including all attachments) must be kept on location and made available to inspectors upon request during the permitted operation.
- 3) All pressure containing equipment must be tested to the approved permitted pressure and recorded on the daily operations report. If well pressures exceed the SITP/MASP stated in the approved permit, the equipment in use must be tested at a minimum to the new observed pressure. The appropriate District must be immediately notified of this pressure change and a RPM submitted to document the change.
- 4) WARS Due BY Wednesdays

Correction Narrative

Permit Primary Type Enhance Production

Permit Subtype(s)

Other Enhance Production

Proposed or **Completed Work**

Operation Description

Use electricline to add 115' MD of perforations in the MC 10.

Procedural Narrative

See attachment

Subsurface Safety Valve

Type Installed SCSSV

Feet below Mudline 575

Maximum Anticipated Surface Pressure (psi) 2320

Shut-In Tubing Pressure (psi)

Maximum Anticipated Wellhead Pressure (psi)

Shut-In Wellhead Pressure (psi) 1881

Rig Information

Name	Id	Type	ABS Date	Coast Guard Date

Application for Permit to Modify (APM)

Lease P00182 **Area** SM **Block** 6683 **Well Name** HE028 **ST** 00 **BP** 00 **Type** Development
Application Status Approved **Operator** 03726 Sable Offshore Corp

Reviews

Review:	APM - District Production Engineering Review
Sent:	20-SEP-24
Review Started:	25-SEP-24
Review Finished:	25-SEP-24
Info Adequate:	Y
Review Remarks:	

Review:	Determination of NEPA Adequacy
Sent:	20-SEP-24
Review Started:	20-SEP-24
Review Finished:	20-SEP-24
Info Adequate:	Y
Review Remarks:	

EXHIBIT 5

Year	ARBID	FacID	Facility	Primary Sector	NAICS Code	NAICS Description	Address	City	State	Zip Code	Latitude	Longitude	Tract	County	District	Basin	Cap-and-Trade	Total GHG	Non-Biomass GHG	Biomass CO2	CO2	CH4	N2O	Covered GHG	VOC	NOx	SOx	PM10	PM2.5	Benzene	13-Butadiene	Chromium Hexavale	Diesel PM	Formaldehyde	Hydrochloric Acid	Hydrogen Sulfide	Nickel
2014	100051	8676	MM Teijigus Energy LLC	Electricity Generation	221110	Other Electric Power	14470 Calle Real,	Goleta	California	93117	34.475	-120.129	CA060830 02932	Santa Barbara	Santa Barbara County	South Central Coast	No	14,153	71	14,082	14,082	0.87	0.17	0	46.2	14.9	3.7	4.9	4.1	1,303							
2014	101054	1325	Freeport-McMoran Oil & Gas LLC -	Oil and Gas Production	486110	Pipeline Transportation of	17100 Calle Mariposa	Goleta	California	93117	34.474	-120.206	CA060830 02932	Santa Barbara	Santa Barbara County	South Central Coast	Yes	13,155	13,155	0	13,142	0.25	0.02	13,155	48.5	1.1	0.1	1.3	1.3	152	6.24	0.003	211	5.27	0.11		
2014	101155	37	Greka Santa Maria Refinery	Refinery	324110	Petroleum Refineries	1660 Sinton Road,	Santa Maria	California	93454	34.929	-120.512	CA060830 02502	Santa Barbara	Santa Barbara County	South Central Coast	No	23,896	23,896	0	23,790	3.71	0.09	0	18	1.9	3.7	0.4	0.4	335	0.696	0	6.58	0.596	0.013		
2014	101318	12	Imerys Minerals California, Inc.	Other Combustion Source	212399	Nonmetallic Mineral Product	All Other 2500 Miguelito Road,	Lompoc	California	93436	34.601	-120.454	CA060830 03102	Santa Barbara	Santa Barbara County	South Central Coast	Yes	47,425	47,425	0	47,379	0.89	0.09	47,425	5.9	28	145.1	166.5	25.3	307	31.4	0.014	407	26.9	310		
2014	101674	3495	Pacific Coast Energy Company LP	Oil and Gas Production	211110	Crude Petroleum and	1555 Orcutt Hill	Orcutt	California	93455	34.841	-120.415	CA060830 02006	Santa Barbara	Santa Barbara County	South Central Coast	Yes	64,738	64,738	0	63,885	39.07	0.1	64,518	67.9	135.6	7.3	3.1	3.1	1,011.85	84.1	0	2,602.26	0.001	0		
2014	104205	201	Vandenberg Air Force Base	Other Combustion Source	928111	National Security	1028 Iceland Ave.,	Vandenberg AFB	California	93437	34.718	-120.536	CA060830 02606	Santa Barbara	Santa Barbara County	South Central Coast	No	14,773	14,773	0	14,756	0.3	0.03	0	3.6	21.1	2	2.3	2.2	3.89	1.71	0.001	72.4	1.43	0.038		
2014	104359	11360	Windset Farms	Other Combustion Source	111419	Food Crops	1650 Black Road,	Santa Maria	California	93458	34.929	-120.488	CA060830 02402	Santa Barbara	Santa Barbara County	South Central Coast	Yes	37,011	37,011	0	36,975	0.69	0.07	37,011	1.9	12.5	4.8	1.9	1.9	4.2	0.48		11.8	0.412	1.38		
2014	104372	2795	University of California, Santa Barbara (opt-in)	Other Combustion Source	611310	Colleges and Universities	University of California, Santa Barbara	California	93106	34.414	-119.845	CA060830 02922	Santa Barbara	Santa Barbara County	South Central Coast	No	15,951	15,951	0	15,935	0.3	0.03	0	3.8	63.6	9.9	5	5	9.57	0.003	0	20.3	0.003	0			
2014	104381	1517	Santa Maria Energy, LLC, Careaga Lease	Oil and Gas Production	211110	Crude Petroleum and	7980 East San Antonio	Santa Maria	California	93455	34.813	-120.395	CA060830 02006	Santa Barbara	Santa Barbara County	South Central Coast	No	9,993	9,993	0	9,983	0.19	0.02	0	24.1	4	0.1	1.3	1.3	196				13			
2014	104413	28	SB Channel (Onshore)	Oil and Gas Production	211110	Crude Petroleum and	7979 Hollister Ave.,	Goleta	California	93117	34.431	-119.912	CA060830 02930	Santa Barbara	Santa Barbara County	South Central Coast	No	13,169	13,169	0	13,156	0.25	0.02	0	87.5	2.7	2.6	0.9	0.9	612	0.085	0	185	0.073	0.002		
2014	104458	11334	ERG Operating Company, LLC	Oil and Gas Production	211110	Crude Petroleum and	6085 Canyon Road,	Santa Maria	California	93454	34.817	-120.283	CA060830 02006	Santa Barbara	Santa Barbara County	South Central Coast	Yes	63,580	63,580	0	62,435	52.89	0.11	63,192	36.1	6.7	4.7	4.3	4.3	1,168.34				28.071		0.01	
2014	104459	3170	ExxonMobil POPCO Facility	Oil and Gas Production	211110	Crude Petroleum and	12000 Calle Real,	Goleta	California	93117	34.482	-120.044	CA060830 02932	Santa Barbara	Santa Barbara County	South Central Coast	Yes	41,546	41,546	0	41,461	1.84	0.15	41,546	77.6	4.6	6.7	1	1	387	11.7	0.005	1,552	9.98	0.209		
2014	104460	1482	ExxonMobil LFC Facility	Oil and Gas Production	211110	Crude Petroleum and	12000 Calle Real,	Goleta	California	93117	34.484	-120.042	CA060830 02932	Santa Barbara	Santa Barbara County	South Central Coast	Yes	281,616	281,616	0	273,925	358.3	0.54	280,912	59.4	45.5	11.7	39	38.9	466	21	0.003	3,622	6.03	0.176		
2014	104479	3095	Lompoc Field Stationary Source	Oil and Gas Production	211110	Crude Petroleum and	3602 Harris Grade	Lompoc	California	93436	34.723	-120.433	CA060830 02809	Santa Barbara	Santa Barbara County	South Central Coast	No	9,393	9,393	0	9,351	0.5	0.1	0	35.7	1.7	0	0.7	0.7	141	6.2	0.003	126	5.31	0.111		
2014	104670	10723	Santa Barbara Cottage Hospital	Other Combustion Source	622110	General Medical and	400 West Pueblo St, Santa	Santa Barbara	California	93105	34.43	-119.723	CA060830 00302	Santa Barbara	Santa Barbara County	South Central Coast	No	12,728	12,728	0	12,715	0.24	0.02	0	0.5	6.7	1.1	1.1	1.1	0							

Unit: Greenhouse Gases - metric tons (1000 kg); Criteria Pollutants - tons (2000 lbs); Toxic Pollutants - pounds (lbs)

EXHIBIT 6



Santa Barbara County
Air Pollution Control District

FINAL REPORTING FORM FOR BREAKDOWNS

Email this report to enfr@sbcapcd.org within one week of the end of the breakdown. Attach supporting documentation or photographs, if necessary.

District Breakdown Tracking No: 11,124 (This number was provided after you submitted your initial report)

I. BREAKDOWN INFORMATION:

Company Name: ExxonMobil Production Company

Permit No: 9100-R5

Facility Name: Hondo Platform

Facility No: 8009

Breakdown Description:

Exceeded Rule 331 Table 1 for allowable major gas leaks during an inspection period.

Component Type: Other

Component Tag #: HO12633

Leak Rate: 50,001 ppmv

Affected Equipment:

H-37/H-40 Gas Lift Header Blind Flange

Device ID: 4964

Device ID:

Device ID:

Device ID:

Rule or Permit Condition that was Violated:

Rule 331 - Condition D.1, Rule 206 - Condition 9.C.3.b

BREAKDOWN CHRONOLOGY

Start of Breakdown	Date:	12/22/14	Time:	14:20
Breakdown Discovered	Date:	12/22/14	Time	14:20
Initial Breakdown Notification Submitted	Date:	12/23/14	Time:	08:13
End of Breakdown	Date:	12/23/14	Time:	18:00
Final Breakdown Report Submitted	Date:	1/27/15	Time:	17:00
Duration of Breakdown	Hours:	27	Minutes:	40

Cause:

An exact cause is difficult to determine, the most likely cause is due to the high vibration, operating pressures and thermal expansion/contraction that occurs during start-ups & shutdowns of the equipment caused the flange gasket seal to leak.

Was the Breakdown Caused by Any of the Following?

- | | | |
|------------------------------------|---------------------------|-------------------------------------|
| Improperly designed equipment: | Yes <input type="radio"/> | No <input checked="" type="radio"/> |
| Lack of preventive maintenance: | Yes <input type="radio"/> | No <input checked="" type="radio"/> |
| Careless or improper operation: | Yes <input type="radio"/> | No <input checked="" type="radio"/> |
| Operator error/willful misconduct: | Yes <input type="radio"/> | No <input checked="" type="radio"/> |

What Steps Were Taken During the Breakdown to Reduce Emissions?

The leak was reported to the Maintenance Foreman and repaired within the two days allowed by Rule 331, Condition E.1.f for major gas leaks from noncritical components.

Has the Breakdown Been Corrected? Yes No

What Steps Were Taken to Correct the Breakdown?

The blind flange was removed and replaced along with a new RTJ ring gasket, the component was reinspected and found to be leak free.

What Measures Have Been Taken or Will Be Taken to Prevent a Recurrence of this Breakdown?

ExxonMobil operates under best practice procedures when working on machinery and strives to achieve leak free conditions of its operating equipment. Due to the high vibration, operating pressures and thermal expansion/contraction that occurs during start-ups & shutdowns of the equipment, it is relatively next to impossible to totally prevent a recurrence.

ESTIMATED EXCESS EMISSIONS

NO _x (lbs)	ROC (lbs)	CO (lbs)	SO _x (lbs)	PM (lbs)	PM ₁₀ (lbs)	H ₂ S (lbs)
0.00	29.66	0.00	0.00	0.00	0.00	2.64

Emission Calculations:

See attached sheet.

II. BREAKDOWN REPORT LOG INFORMATION:

Report Filed by (print name): Steve Shively

Job Title or Position of the Person Filing: Air Compliance Regulatory Technician

Telephone Number of the Person Filing: 805-271-2637

Date of Report: 1/27/15

EXHIBIT 7

PROSPECTUS



7,500,000 Shares of Common Stock

This prospectus relates to the offer and sale from time to time by the selling securityholders named in this prospectus (the “*Selling Holders*”), or their permitted transferees, of up to 7,500,000 shares of our Common Stock, \$0.0001 par value (“*Common Stock*”) of Sable Offshore Corp. (formerly known as Flame Acquisition Corp.) (the “*Company*”) issued in a committed PIPE investment of \$150,000,000 (the “*Second PIPE Investment*”) at an equity consideration value of \$20.00 per share by certain of the Selling Holders named in this prospectus. We are registering the securities for resale pursuant to the Selling Holders’ registration rights under certain agreements between us and the Selling Holders, as applicable to each Selling Holder. Our registration of the securities covered by this prospectus does not mean that the Selling Holders will offer or sell any of the securities. The Selling Holders may offer, sell or distribute all or a portion of their shares of Common Stock publicly or through private transactions at prevailing market prices or at negotiated prices. We will not receive any of the proceeds from any resale of the Common Stock being offered for resale in this prospectus (the “*Resale Securities*”). We provide more information about how the Selling Holders may sell their securities in the section of this prospectus entitled “*Plan of Distribution*.¹” We have agreed to bear all of the expenses incurred in connection with the registration of these securities. The Selling Holders will pay or assume underwriting fees, discounts and commissions or similar charges, if any, incurred in the sale of securities by them.

We may amend or supplement this prospectus from time to time by filing amendments or supplements as required.

Our Common Stock and Public Warrants are listed on the New York Stock Exchange (the “*NYSE*”) under the symbols “SOC” and “SOC.WS,” respectively. On October 31, 2024, the closing price of our Common Stock was \$22.36 per share and the closing price of our Public Warrants was \$11.38 per warrant.

The Resale Securities represent a substantial percentage of the total outstanding shares of our Common Stock as of the date of this prospectus. The shares of Common Stock that the Selling Holders can sell into the public markets pursuant to this prospectus is up to 7,500,000 shares of Common Stock, constituting approximately 9.2% of our issued and outstanding shares of Common Stock and approximately 13.1% of our issued and outstanding shares of Common Stock held by non-affiliates. The sale of all the Resale Securities or the perception that these sales could occur, could result in a significant decline in the public trading price of our securities. See the section of this prospectus entitled “*Risk Factors—Risks Related to Being a Public Company—Sales of a substantial number of our securities in the public market by the Selling Holders or by our existing securityholders could cause the price of our shares of Common Stock to fall.*”

We are an “emerging growth company” under applicable Securities and Exchange Commission rules and will be eligible for reduced public company reporting requirements. See “*Prospectus Summary—Emerging Growth Company; Smaller Reporting Company*.²”

Investing in our Common Stock involves risks. For a discussion of the material risks that you should consider, see “*Risk Factors*” beginning on page 17 of this prospectus.

None of the Securities and Exchange Commission or any state securities commission has approved or disapproved of these securities or determined if this prospectus is accurate or complete. Any representation to the contrary is a criminal offense.

The date of this Prospectus is November 1, 2024

Table of Contents

gas, oil and NGL financial swaps. The prices and quantities at which we enter into commodity derivative contracts covering our production in the future will be dependent upon oil and natural gas prices and price expectations at the time we enter into these transactions, which may be substantially higher or lower than current or future oil and natural gas prices. Accordingly, our price hedging strategy may not protect us from significant declines in oil, natural gas and NGL prices received for our future production. Many of the derivative contracts to which we will be a party will require us to make cash payments to the extent the applicable index exceeds a predetermined price, thereby limiting our ability to realize the benefit of increases in oil, natural gas and NGL prices. If our actual production and sales for any period are less than our hedged production and sales for that period (including reductions in production due to operational delays) or if we are unable to perform our drilling activities as planned, we might be forced to satisfy all or a portion of our hedging obligations without the benefit of the cash flow from our sale of the underlying physical commodity, which may materially impact our liquidity.

Developing and producing oil, natural gas and NGLs are costly and high-risk activities with many uncertainties that may result in a total loss of investment or otherwise adversely affect our business, financial condition, results of operations and cash flows. Many of these risks are heightened for us due to the fact that most of our equipment has been shut-in for more than eight years.

Our development and production operations may be curtailed, delayed, canceled or otherwise negatively impacted as a result of many factors, including:

- high costs, shortages or delivery delays of rigs, equipment, labor, electrical power or other services;
- unusual or unexpected geological formations;
- composition of sour natural gas, including sulfur, carbon dioxide and other diluent content;
- unexpected operational events and conditions;
- failure of down hole equipment and tubulars;
- loss of wellbore mechanical integrity;
- failure, unavailability or shortage of capacity of gathering and transportation pipelines, or other transportation facilities;
- human errors, facility or equipment malfunctions and equipment failures or accidents, including acceleration of deterioration of our facilities and equipment due to the highly corrosive nature of sour natural gas;
- excessive wall loss or other loss of pipeline integrity;
- title problems;
- litigation, including landowner lawsuits;
- loss of drilling fluid circulation;
- hydrocarbon or oilfield chemical spills;
- fires, blowouts, surface craterings and explosions;
- surface spills or underground migration due to uncontrollable flows of oil, natural gas, formation water or well fluids;
- delays imposed by or resulting from compliance with environmental and other governmental or regulatory requirements;
- delays due to operations in environmentally sensitive areas; and
- adverse weather conditions and natural disasters.

EXHIBIT 8

Categorical Exclusion Review (CER)

September 20, 2024

Sable Offshore Well HE-23 – Reperforations

Proposed Action

BSEE proposes to permit Sable to perform well-reworking activities on Well HE-23. The surface of the well is located in Lease OCS-P-182; Area SM; Block 6683; and the bottom-hole is located in Lease OCS-P-182; Area SM; Block 6683.

Categorical Exclusion

This proposed action is categorically excluded from further National Environmental Policy Act (NEPA) analysis in accordance with 516 DM 15.4 (C)(12).

Applicability of a CE

I have reviewed Sable's Application for a Permit Modification (APM), submitted September 19, 2024, for the action described above.

Reperforating and adding new perforations to an existing downhole completion is considered normal well-reworking operations under 30 CFR 250.180 et. seq., and is consistent with those activities considered and evaluated in the original Development and Production Plan (1982), the potential environmental impacts of which were analyzed in a joint Environmental Impact Statement/Report with the Minerals Management Service (MMS), California State Lands Commission and the County of Santa Barbara, for Lease OCS P-182, dated June 1984.

Approval of the Sable APM for Well HE-23 meets the definition of the Categorical Exclusion for “Approval of an Application for Permit to Drill an offshore oil and gas exploration or development well, when said well and appropriate mitigation measures are described in an approved exploration plan, development plan, production plan, or Development Operations Coordination Document,” [516 DM 15.4 (C)(12)]. As described below, no extraordinary circumstances were found that would counsel against application of a Categorical Exclusion for this proposed action.

This NEPA review and subsequent approval regard only the processes and procedures generally outlined in this document as derived from the eWells submission for Well HE-23 and shall not be construed as incorporating by reference or inference any other operation(s) proposed or contemplated for Well HE-23.

Extraordinary Circumstances

Actions that normally fall within the scope of a categorical exclusion require further analysis under NEPA where extraordinary circumstances apply. The Department's list of relevant extraordinary circumstances is located at 43 CFR 46.215. The following analysis evaluates the applicability of each identified extraordinary circumstance:

Will the proposed activities:	Answer:
(a)...have significant impacts on public health or safety?	No: Activities will be conducted offshore under applicable safety and environmental regulations. Routine reservoir maintenance activities such as the proposal have little to no risk of a blowout which could result in an oil spill.
(b)...have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); floodplains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas?	No: Although Platform Heritage is located near the (proposed) Chumash Heritage National Marine Sanctuary, the proposed operations will not have a significant impact on such natural or cultural resources.
(c)...have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102(2)(E)]?	No: Controversial environmental effects or unresolved conflicts on available resources are not expected for this area of the Federal OCS
(d)...have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No: The greatest environmental concern with the proposed activity is the risk of an oil spill. Risk of an oil spill is low for this proposal and any effects of an oil spill that may occur are well documented and have been evaluated in previous environmental reviews.
(e)...establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No: Proposed activities are consistent with existing, approved development and production plans for the area.
(f)...have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects?	No: Past, present, or reasonably foreseeable oil and gas development in the area have been evaluated and considered in previous environmental reviews.
(g)...have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau?	No: Proposed activities will not occur in the vicinity of properties listed, or eligible for listing, on the National Register of Historic Places.

(h)...have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species or have significant impacts on designated Critical Habitat for these species?	No: The proposed activity will not have significant impacts on listed species or critical habitat.
(i)...violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment?	No: Proposed activities will be conducted in compliance with all applicable laws imposed for the protection of the environment.
(j)...have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No: The proposed activity will not disproportionately affect low income or minority populations.
(k)...limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007)?	No: Proposed activities will not limit access or ceremonial use of Indian sacred sites.
(l)...contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act (FNWCA) and EO 11122)?	No: Proposed activities will be conducted on the Federal OCS using existing local vessels (crewboats, workboats, etc.).

Conclusion

This action would not threaten a violation of applicable environmental statutory, regulatory, or permit requirements; or significantly affect the quality of the human environment (40 CFR 1508.27). Furthermore, there are no extraordinary circumstances related to this action that may affect the significance of the environmental effects of the action. As such, it is categorically excluded from the need to prepare further NEPA analysis.

Prepared by: James Salmons
James J. Salmons
Regional Environmental Officer

09/20/2024
Date

Categorical Exclusion Review (CER)

September 20, 2024

Sable Offshore Well HE-28 – Reperforations

Proposed Action

BSEE proposes to permit Sable to perform well-reworking activities on Well HE-28. The surface of the well is located in Lease OCS-P-182; Area SM; Block 6683; and the bottom-hole is located in Lease OCS-P-182; Area SM; Block 6683.

Categorical Exclusion

This proposed action is categorically excluded from further National Environmental Policy Act (NEPA) analysis in accordance with 516 DM 15.4 (C)(12).

Applicability of a CE

I have reviewed Sable's Application for a Permit Modification (APM), submitted September 19, 2024, for the action described above.

Reperforating and adding new perforations to an existing downhole completion is considered normal well-reworking operations under 30 CFR 250.180 et. seq., and is consistent with those activities considered and evaluated in the original Development and Production Plan (1982), the potential environmental impacts of which were analyzed in a joint Environmental Impact Statement/Report with the Minerals Management Service (MMS), California State Lands Commission and the County of Santa Barbara, for Lease OCS P-182, dated June 1984.

Approval of the Sable APM for Well HE-28 meets the definition of the Categorical Exclusion for “Approval of an Application for Permit to Drill an offshore oil and gas exploration or development well, when said well and appropriate mitigation measures are described in an approved exploration plan, development plan, production plan, or Development Operations Coordination Document,” [516 DM 15.4 (C)(12)]. As described below, no extraordinary circumstances were found that would counsel against application of a Categorical Exclusion for this proposed action.

This NEPA review and subsequent approval regard only the processes and procedures generally outlined in this document as derived from the eWells submission for Well HE-28 and shall not be construed as incorporating by reference or inference any other operation(s) proposed or contemplated for Well HE-28.

Extraordinary Circumstances

Actions that normally fall within the scope of a categorical exclusion require further analysis under NEPA where extraordinary circumstances apply. The Department's list of relevant extraordinary circumstances is located at 43 CFR 46.215. The following analysis evaluates the applicability of each identified extraordinary circumstance:

Will the proposed activities:	Answer:
(a)...have significant impacts on public health or safety?	No: Activities will be conducted offshore under applicable safety and environmental regulations. Routine reservoir maintenance activities such as the proposal have little to no risk of a blowout which could result in an oil spill.
(b)...have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); floodplains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas?	No: Although Platform Heritage is located near the (proposed) Chumash Heritage National Marine Sanctuary, the proposed operations will not have a significant impact on such natural or cultural resources.
(c)...have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102(2)(E)]?	No: Controversial environmental effects or unresolved conflicts on available resources are not expected for this area of the Federal OCS
(d)...have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No: The greatest environmental concern with the proposed activity is the risk of an oil spill. Risk of an oil spill is low for this proposal and any effects of an oil spill that may occur are well documented and have been evaluated in previous environmental reviews.
(e)...establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No: Proposed activities are consistent with existing, approved development and production plans for the area.
(f)...have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects?	No: Past, present, or reasonably foreseeable oil and gas development in the area have been evaluated and considered in previous environmental reviews.
(g)...have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau?	No: Proposed activities will not occur in the vicinity of properties listed, or eligible for listing, on the National Register of Historic Places.

(h)...have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species or have significant impacts on designated Critical Habitat for these species?	No: The proposed activity will not have significant impacts on listed species or critical habitat.
(i)...violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment?	No: Proposed activities will be conducted in compliance with all applicable laws imposed for the protection of the environment.
(j)...have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No: The proposed activity will not disproportionately affect low income or minority populations.
(k)...limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007)?	No: Proposed activities will not limit access or ceremonial use of Indian sacred sites.
(l)...contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act (FNWCA) and EO 11122)?	No: Proposed activities will be conducted on the Federal OCS using existing local vessels (crewboats, workboats, etc.).

Conclusion

This action would not threaten a violation of applicable environmental statutory, regulatory, or permit requirements; or significantly affect the quality of the human environment (40 CFR 1508.27). Furthermore, there are no extraordinary circumstances related to this action that may affect the significance of the environmental effects of the action. As such, it is categorically excluded from the need to prepare further NEPA analysis.

Prepared by: James Salmons
James J. Salmons
Regional Environmental Officer

09/20/2024
Date

EXHIBIT 9



DONATE



ENVIRONMENT

LISTEN & FOLLOW



Trump wants to 'Drill, baby, drill.' What does that mean for climate concerns?

UPDATED NOVEMBER 15, 2024 · 11:03 AM ET

HEARD ON MORNING EDITION

By A Martinez, H.J. Mai

3-Minute Listen[PLAYLIST](#)[Download](#)[Transcript](#)

Attendees holding signs listen as Republican presidential nominee former President Donald Trump speaks during a campaign event at Alro Steel on Aug. 29, 2024, in Pontiac, Mich.

Exhibit 9 - Page 1

Morning Edition is diving into promises President-elect Donald Trump said he would fulfill in his second term. NPR's A Martinez asks energy and climate policy expert Brian Murray what Trump's plan to focus on oil and gas means for green initiatives.

What Trump has said about scaling up oil and gas production and rolling back green alternatives.

President-elect Donald Trump has been very vocal about his support of America's oil and gas industry.

His campaign slogan, "Drill, Baby, Drill" has become synonymous with his plan to boost fossil fuel production and reverse climate policies and regulations aimed at reducing U.S. carbon emissions.

Trump earlier this year said he "will terminate" the Inflation Reduction Act and issue an executive order to "make sure that [offshore wind] ends on day one."

NPR's A Martinez spoke with Brian Murray, director of the Nicholas Institute for Energy, Environment & Sustainability at Duke University, to understand what President-elect Trump's proposals could mean for U.S. energy and climate policy.